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**BY EMAIL**

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Re: Uniformed Fire Officers Association, et al. v. Bill DeBlasio, et al.  
20-cv-05441 (KPF) (RWL)

Dear Mr. Coles, Mr. Hepworth and Ms. Saleski:

In response to Discovery Request No. 1, please see the information below regarding disciplinary records released prior to the July 15, 2020 stay entered by Justice Edmead. This information is complete to the best of our knowledge at this time. It is our understanding that NYPD, DOC and FDNY have not responded to any public requests for disciplinary records received since the repeal of § 50-a. As you know, however, CCRB disclosed a number of disciplinary records between June 12, 2020 and July 14, 2020. CCRB responded to requests from

individuals and the media. CCRB also held demonstrations of a website where it intended to house a database of Officer Histories. That website was removed as of July 15, 2020 in accordance with the stay issued by Justice Edmead. The URL to that website was shared with the CCRB Board and their staff. The City's Department of Information Technology and Telecommunications ("DoITT") assisted with the creation of the URL and thus had access to the database. The database was discussed at CCRB's open Board Meeting on July 8, but the URL was not shared because DoITT wanted more time to prepare for the expected heavy traffic that the database would generate. Following the Board Meeting, at the request of the Legal Aid Society, the database was shown to them at another meeting held on July 14, 2020. Legal Aid staff, were able to view the URL at that meeting and following the meeting a Legal Aid staff member accessed and downloaded the database. After learning Legal Aid had accessed and downloaded the database, CCRB asked them not to publicize the information they obtained. Corey Stoughton, of the Legal Aid Society has advised CCRB that it will not make any public disclosures of the database, unless it deems such disclosures necessary to represent its clients. On June 29, CCRB's Executive Director, Jonathan Darche, shared the URL through email to Chris Dunn from NYCLU, and on July 2, he shared the URL with Cynthia Conti-Cook of the Ford Foundation. Mr. Darche shared the URL with Mr. Dunn and Ms. Conti-Cook to solicit feedback on the search functions of the database because of their familiarity with police records databases. Below is a list of CCRB's disclosures of disciplinary records either via the database or FOIL requests in sequential order:

- **Data and Documents Released by the CCRB between June 12, 2020, and July 24, 2020**
- On or about June 16, 2020, four officer histories were sent to a member of the public in response to a request made on or about June 9, 2020.
- On or about June 18, 2020, the name of an officer was provided to a member of the public in response to a request made on or about June 12, 2020.
- On or about June 18, 2020, a dataset of the dispositions of complaints where officers were assigned to "anti-crime" (containing 654 officers who were the subject of at least one full-investigation, who were assigned to anticrime at the time of case closure between 2015 and 2020) was sent to Ashley Southall of the New York Times in response to a request that was made on or about June 16, 2020.
- On or about June 19, 2020, 12 officer histories were sent to Jose Pagliery of Univision in response to a request that was made on or about June 12, 2020.
- On or about June 19, 2020, nine officer histories were sent to a member of the public in response to a request made on or about June 15, 2020.
- On or about June 19, 2020, 10 officer histories and a spreadsheet listing the total number of complaints and total number of substantiated complaints for those 10 officers were sent to Noah Goldberg in response to a request made on or about June 16, 2020.
- On or about June 19, 2020, two officer histories were sent to Yoav Gonen of The CITY, in response to a request made on or about June 18, 2020.
- On or about June 19, 2020, one officer history was sent to Sonia Moghe of CNN in response to a request made on or about June 18, 2020.

- On or about June 20, 2020, a dataset containing the substantiated officer histories of 40 officers was sent to Eric Umansky of ProPublica in response to a request made on or about June 19, 2020.
- On or about June 22, 2020, three officer histories were sent to Michael Sisak of the Associated Press in response to a request made on or about June 12, 2020.
- On or about June 22, 2020, one officer history and 20 redacted complaint reports containing 25 distinct subject officers were sent to Tana Geneva of the Intercept in response to a request made on or about June 15, 2020.
- On or about June 22, 2020, one officer history was sent to Michael Sisak of the Associated Press in response to a request made on or about June 21, 2020.
- On or about June 22, 2020, one officer history was sent to Sonia Moghe of CNN in response to a request made on or about June 22, 2020.
- On or about June 22, 2020, five officer histories were sent to Ashley Southall of the New York Times in response to a request made on or about June 22, 2020.
- On or about June 22, 2020, one officer history was sent to Zipporah Osei of ProPublica in response to a request made on or about June 22, 2020.
- On or about June 22, 2020, four officer histories were sent to Aliza Chasan of Pix11 in response to a request made on or about June 22, 2020.
- On or about June 22, 2020, one officer history was sent to a possible journalist Sandra Guzman of in response to a request made on or about June 22, 2020.
- On or about June 23, 2020, three officer histories were sent to Junico Simino of NY1 in response to a request made on or about June 23, 2020.
- On or about June 25, 2020, one officer history was sent to Jose Pagliery of Univision in response to a request made on or about June 23, 2020.
- On or about June 25, 2020, 14 officer histories were sent to Greg Smith of The CITY in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, four officer histories were sent to Rosa Goldensohn of The CITY in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, three officer histories were sent to David Brand of Queens Daily Eagle in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, one officer history was sent to Ben Chapman of the Wall Street Journal in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, one officer history was sent to Yoav Gonen of The CITY in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, one officer history was sent to Antwan Lewis of Fox5 in response to a request made on or about June 25, 2020.
- On or about June 25, 2020, a dataset containing the substantiated, unsubstantiated, exonerated, unfounded, and truncated histories for 40 officers was sent to Kendal Taggart of Buzzfeed and Craig McCarthy of the New York Post in response to requests made on or about June 18, 2020.
- On or about June 26, 2020, one officer history was sent to David Lewis of WNYC in response to a request made on or about June 12, 2020.

- On or about June 26, 2020, two officer histories were sent to Rocco Parascandola of New York Daily News in response to requests made on or about June 23, 2020.
- On or about June 29, 2020, eight redacted complaint reports containing 14 distinct subject officers were sent to Michael Sisak of the Associated Press in response to a request made on or about June 21, 2020.
- On or about June 29, 2020, one officer history was sent to Ese Olumhense of The CITY in response to a request made on or about June 22, 2020.
- On or about June 29, 2020, one officer history was sent to Rosa Goldensohn of The CITY in response to a request made on or about June 22, 2020.
- On or about June 29, 2020, one officer history was sent to a possible member of the press John Doyle in response to a request made on or about June 25, 2020.
- On or about June 29, 2020, one redacted complaint report containing three distinct subject officers was sent to Sonia Moghe of CNN in response to a request made on or about June 22, 2020.
- On or about June 29, 2020, three officer histories were sent to Craig McCarthy of the New York Post in response to requests made on or about June 25, 2020.
- On or about June 29, 2020, one officer history was sent to a possible journalist Kayman Whaley in response to a request made on or about June 26, 2020.
- On or about June 29, 2020, 20 officer histories were sent to Yoav Gonen of The CITY in response to a request made on or about June 29, 2020.
- On or about June 29, 2020, 23 officer histories and 66 redacted complaint reports containing 110 distinct subject officers were sent to the Public Advocate.
- On or about June 30, 2020, one redacted complaint report containing three distinct subject officers was sent to Rocco Parascandola of the Daily News in response to a request that was made on or about June 22, 2020.
- On or about June 30, 2020, seven redacted complaint reports containing 13 distinct subject officers were sent to Yoav Gonen of The CITY in response to a request made on or about June 25, 2020.
- On or about June 30, 2020, one officer history was sent to a member of the public in response to a request made on or about June 29, 2020.
- On or about June 30, 2020, a dataset containing the substantiated, unsubstantiated, exonerated, unfounded, and truncated histories for 4059 officers was sent to Eric Umansky of ProPublica in response to a request made on or about June 24, 2020.
- On or about July 1, 2020, two redacted complaint reports containing seven distinct subject officers were sent to Rosa Goldensohn of The CITY in response to a request made on or about June 25, 2020.
- On or about July 1, 2020, three officer histories were sent to Kyle Lawson of SI Advance in response to a request made on or about June 30, 2020.
- On or about July 1, 2020, one officer history was sent to Rocco Parascandola of the Daily News in response to a request made on or about June 30, 2020.

- On or about July 2, 2020, four redacted complaint reports containing seven distinct subject officers were sent to Rosa Goldensohn of The CITY in response to a request made on or about June 25, 2020.
- On or about July 2, 2020, 15 officer histories were sent to Jose Pagliery of Univision in response to a request made on or about June 30, 2020.
- On or about July 2, 2020, 92 officer histories were sent to Gabriel Sandoval of The New York Times in response to a request made on or about June 30, 2020.
- On or about July 2, 2020, three officer histories were sent to Maya Kaufman of Queens Patch in response to requests made on or about July 1, 2020.
- On or about July 2, 2020, 20 officer histories were sent to Yoav Gonen of The CITY in response to a request made on or about July 2, 2020.
- On or about July 6, 2020, 59 officer histories were sent to Jose Pagliery of Univision in response to requests made on or about June 30, 2020.
- On or about July 6, 2020, 30 redacted complaint reports with 36 distinct subject officers were released to Greg Smith in response to a request made on or about June 30, 2020.
- On or about July 6, 2020, 10 redacted complaint reports containing 10 distinct subject officers were sent to Rosa Goldensohn of The CITY in response to a request made on or about July 1, 2020.
- On or about July 7, 2020, seven officer histories were sent to David Brand of Queens Daily Eagle in response to a request made on or about June 25, 2020.
- On or about July 7, 2020, two officer histories were sent to a member of the public in response to requests made on or about June 26, 2020.
- On or about July 7, 2020, 16 redacted complaint reports containing 22 distinct subject officers were sent to Rosa Goldensohn of The CITY in response to a request made on or about July 1, 2020.
- On or about July 7, 2020, two officer histories were sent to a member of the public in response to requests made on or about July 1, 2020.
- On or about July 7, 2020, one officer history was sent to a member of the public in response to a request made on or about July 1, 2020.
- On or about July 7, 2020, a dataset containing the substantiated, unsubstantiated, exonerated, unfounded, and truncated histories for 229 officers was sent to Kendal Taggart of BuzzFeed in response to a request made on or about June 24, 2020.
- On or about July 8, 2020, the CCRB document retention policies were sent to a member of the public in response to a request made on or about June 25, 2020.
- On or about July 8, 2020, a dataset containing demographic information, but no other identifying information, for the officers and civilians involved in complaints between 2013 and 2019 regardless of disposition was sent to academic researchers at the University of Cincinnati in response to a request made on or about June 27, 2020.
- On or about July 8, 2020, seven officer histories were sent to Rocco Parascandola of the Daily News in response to a request made on or about July 7, 2020.
- On or about July 9, 2020, 145 redacted complaint reports containing 148 distinct subject officers were sent to Greg Smith in response to a request made on or about June 26, 2020.

- On or about July 9, 2020, 22 officer histories were sent to George Joseph of WNYC/Gothamist in response to requests made on or about July 6, 2020.
- On or about July 10, 2020, a full officer history was sent to another police department where the officer was seeking employment in response to a request made on or about July 7, 2020; the officer had provided a release form allowing for the complete release of the records.
- On or about July 12, 2020, a redacted summary of all FOIL requests received between June 12, 2020 and July 12, 2020 was sent to Craig McCarthy of The New York Post in response to a request made on or about June 18, 2020.
- On or about July 13, 2020, 10 redacted complaint reporters containing four distinct subject officers was sent to a member of the public in response to a request made on or about June 17, 2020.
- On or about July 13, 2020, a dataset containing the status of all cases initiated with the Administrative Prosecution Unit between January 1, 2014, and March 1, 2020 (containing 591 officers) was sent to journalist Michael Hayes in response to a request made on or about June 22, 2020.
- On or about July 13, 2020, 22 officer histories were sent to Jose Pagliery of Univision in response to requests made on or about June 30, 2020.
- On or about July 14, 2020, a dataset containing the complete allegation history in the CCRB's database was sent to the NYCLU in response to a request made on or about July 9, 2020.
- On or about July 15, 2020, 101 redacted complaint reports containing 98 distinct subject officers were sent to Joaquin Sapien of ProPublica and Greg Smith of The CITY in response to requests made on or about July 6, 2020 and July 9, 2020, respectively.
- On or about July 20, 2020, a member of the public was sent the audio recording of their CCRB interview from their complaint in response to a request made on or about July 13, 2020.
  
- CCRB Email to the Board – July 1, 2020  
 Email sharing the URL of the database of Officer Histories shared with CCRB Board Members.
  
- Emails from Executive Director  
 Executive Director of CCRB shared a URL of an early, incomplete version of the database of Officer Histories with Chris Dunn of NYCLU on June 29, 2020 and with an attorney at the Ford Foundation, Cynthia Conti-Cook, on July 2, 2020.
  
- CCRB Email to Senior Staff – July 2, 2020  
 Email sharing the URL of the database of Officer Histories shared with all CCRB staff.

- CCRB Open Board Meeting – July 8, 2020

256 attendees. CCRB shared plans to release a URL containing a database of Officer Histories. The URL was not disclosed.

- CCRB Meeting with Legal Aid Society – July 14, 2020

6 attendees from Legal Aid Society. CCRB's Officer History database was shared, including the URL, which Legal Aid staff accessed and downloaded information from. Legal Aid has provided assurances that they will not disclose or use the information.

Sincerely,

/s/

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Rebecca G. Quinn  
Assistant Corporation Counsel

/s/

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Dominique Saint-Fort  
Assistant Corporation Counsel